

2011 Feb-23 PM 04:13  
U.S. DISTRICT COURT  
N.D. OF ALABAMAState of Alabama  
Unified Judicial SystemSUMMONS  
- CIVIL -Case Number:  
01-CV-2010-902180.00

Form C-34 Rev 6/88

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

TRANSOCEAN OFFSHORE DEEPWATER DRILLING, C/O CT CORPORATION 2 N JACKSON ST, STE 605, MONTGOMERY, AL 36104

## NOTICE TO

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM/s ANNE-MARIE ADAMS

Date

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

## RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

Case Number:  
01-CV-2010-902180.00

TRANSOCEAN, LTD., 4 GREENWAY PLAZA, HOUSTON, TX 77046

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

- ☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

By

- Plaintiff's/Attorney's Signature

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

**Server's Signature**



State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS**  
**- CIVIL -**

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

TRANSOCEAN DEEPWATER, INC, PARK TEN CENTRE 1311BROADFIELD BLVDSTE400, HOUSTON, TX 77084

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

State of Alabama Unified Judicial System Form C-34 Rev 6/88	<b>SUMMONS</b> <b>- CIVIL -</b>	Case Number: <b>01-CV-2010-902180.00</b>
---	------------------------------------	---

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
 SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

BP PRODUCTS NORTH AMERICA, C/O CSC LAWYERS INC SVC 150 SOUTH PERRY STREET, MONTGOMERY, AL 36104

NOTICE TO \_\_\_\_\_

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC

pursuant to the Alabama Rules of the Civil Procedure

<u>1/17/2011 3:59:52 PM</u>	<u>/s ANNE-MARIE ADAMS</u>	
Date	Clerk/Register	By

☒ Certified mail is hereby requested /s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

<u>                    </u>	<u>                    </u>	
Date	Server's Signature	

Case Number:  
01-CV-2010-902180.00

TRANSOCEAN HOLDINGS, LLC, 4 GREENWAY PLAZA, STE700, HOUSTON, TX 77046

NOTICE TO

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the *Alabama Rules of the Civil Procedure*

1/17/2011 3:59:52 PM

/s/ ANNE-MARIE ADAMS

Date \_\_\_\_\_

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date \_\_\_\_\_

Server's Signature

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS  
- CIVIL -**

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

TRITON ASSET LEASING GMBH, 24 GREENWAY PLAZA, HOUSTON, TX 77046

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.  
TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

- ☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant
- ☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

Date

/s ANNE-MARIE ADAMS

Clerk/Register

By

- ☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

- ☐ Return receipt of certified mail received in this office on \_\_\_\_\_

- ☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

Server's Signature



Server's Signature

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS**  
**- CIVIL -**

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

BP AMERICA PRODUCTION CO., C/O CT CORP SYSTEMS 2 N JACKSON ST, STE 605, MONTGOMERY, AL 36104

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

Date

/s ANNE-MARIE ADAMS

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

State of Alabama Unified Judicial System Form C-34 Rev 6/88	<b>SUMMONS</b> <b>- CIVIL -</b>	Case Number: <b>01-CV-2010-902180.00</b>
---	------------------------------------	---

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
 SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

M-I, LLC, C/O CAPITAL CORP SVCS, INC 150 SOUTH PERRY STREET, MONTGOMERY, AL 36104

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
 pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM  
 Date

/s ANNE-MARIE ADAMS  
 Clerk/Register

By

☒ Certified mail is hereby requested /s MICHAEL SHANE LUCADO MR.  
 Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_  
 \_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

State of Alabama Unified Judicial System  Form C-34 Rev 6/88	<b>SUMMONS</b> <b>- CIVIL -</b>	Case Number: <b>01-CV-2010-902180.00</b>
---	------------------------------------	---

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
 SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

BP EXPLORATION & PRODUCTION INC, C/O CT CORP SYSTEMS 2 N JACKSON ST, STE605, MONTGOMERY, AL 36104

NOTICE TO \_\_\_\_\_

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM /s ANNE-MARIE ADAMS \_\_\_\_\_

Date Clerk/Register By

☒ Certified mail is hereby requested /s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

\_\_\_\_\_  
 Date Server's Signature

Case Number:  
01-CV-2010-902180.00

CAMERON INTERNATIONAL CORPORATION, C/O CT CORP SYSTEMS 2 N JACKSON ST, STE 605, MONTGOMERY, AL 36104

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.  
TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

- ☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant
- ☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date \_\_\_\_\_

Clerk/Register

By

- ☒ Certified mail is hereby requested

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

- ☐ I certify that I personally delivered a copy of the Summons and Complaint to

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date \_\_\_\_\_

Server's Signature

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS**  
- CIVIL -

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

ANADARKO PETROLEUM CORP., C/O CT CORP SYSTEMS 2 N JACKSON ST, STE605, MONTGOMERY, AL 36104

NOTICE TO

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS**  
**- CIVIL -**

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

DRILQUIP, INC., ONE SHELL PLAZA 701 POYDRAS STREET, NEW ORLEANS, LA 70139

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS  
- CIVIL -**

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

ANADARKO E & P CO, LP, C/O CT CORPORATION SYSTEM 2 N JACKSON ST, STE 605, MONTGOMERY, AL 36104

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.  
TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

- ☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant
- ☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

Date

/s ANNE-MARIE ADAMS

Clerk/Register

By

- ☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

- ☐ Return receipt of certified mail received in this office on \_\_\_\_\_

- ☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature



State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS  
- CIVIL -**

Case Number:  
**01-CV-2010-902180.00**

**IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL**

MOEX OFFSHORE 2007, 9 GREENWAY PLAZA, HOUSTON, TX 77046

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S. BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.  
TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

State of Alabama Unified Judicial System Form C-34 Rev 6/88	<b>SUMMONS</b> <b>- CIVIL -</b>	Case Number: <b>01-CV-2010-902180.00</b>
---	------------------------------------	---

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
 SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

TRANSOCEAN OFFSHORE DEEPWATER DRILLING, C/O CT CORPORATION 2 N JACKSON ST, STE 605, MONTGOMERY, AL 36104

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
 pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM  
 Date

/s ANNE-MARIE ADAMS  
 Clerk/Register

By

☒ Certified mail is hereby requested /s MICHAEL SHANE LUCADO MR.  
 Plaintiffs/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_  
 \_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature



Case Number:  
01-CV-2010-902180.00

BP, PLC, C/O CT CORP SYSTEMS 1200 SOUTH PINE ISLAND RD, PLANTATION, FL 33324

## NOTICE TO

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

- ☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

- ☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date \_\_\_\_\_

Clerk/Register

By

- ☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

## RETURN ON SERVICE:

- ☐
- Return receipt of certified mail received in this office on \_\_\_\_\_

- ☐ I certify that I personally delivered a copy of the Summons and Complaint to

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date \_\_\_\_\_

Server's Signature

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS**  
**- CIVIL -**

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

TRANSOCEAN DEEPWATER, INC, PARK TEN CENTRE 1311BROADFIELD BLVDSTE400, HOUSTON, TX 77084

NOTICE TO

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS  
- CIVIL -**

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

BP PRODUCTS NORTH AMERICA, C/O CSC LAWYERS INC SVC 150 SOUTH PERRY STREET, MONTGOMERY, AL 36104

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiffs/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

Case Number:  
01-CV-2010-902180.00

TRANSOCEAN HOLDINGS, LLC, 4 GREENWAY PLAZA, STE700, HOUSTON, TX 77046

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC pursuant to the Alabama Rules of the Civil Procedure

By

Plaintiff's/Attorney's Signature

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Server's Signature

State of Alabama Unified Judicial System Form C-34 Rev 6/88	<b>SUMMONS</b> <b>- CIVIL -</b>	Case Number: <b>01-CV-2010-902180.00</b>
---	------------------------------------	---

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
 SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

TRITON ASSET LEASING GMBH, 24 GREENWAY PLAZA, HOUSTON, TX 77046

**NOTICE TO** \_\_\_\_\_

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM  
 Date

/s ANNE-MARIE ADAMS  
 Clerk/Register

\_\_\_\_\_  
 By

☒ Certified mail is hereby requested /s MICHAEL SHANE LUCADO MR.  
 Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Server's Signature



Case Number:  
01-CV-2010-902180.00

BP AMERICA INC., C/O CT CORP SYSTEMS 2 N JACKSON ST,STE 605, MONTGOMERY, AL 36104

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.  
TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

- ☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

By

- Plaintiff's/Attorney's Signature

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Server's Signature

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS  
- CIVIL -**

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

HALLIBURTON, C/O CT CORP SYSTEMS 2 N JACKSON ST, STE605, MONTGOMERY, AL 36104

NOTICE TO

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.  
TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

Date

/s ANNE-MARIE ADAMS

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS**  
- CIVIL -

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

BP AMERICA PRODUCTION CO., C/O CT CORP SYSTEMS 2 N JACKSON ST, STE 605, MONTGOMERY, AL 36104

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiffs/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature



Case Number:  
01-CV-2010-902180.00

BP EXPLORATION & PRODUCTION INC, C/O CT CORP SYSTEMS 2 N JACKSON ST, STE605, MONTGOMERY, AL 36104

## NOTICE TO

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

- ☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

- ☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date \_\_\_\_\_

Clerk/Register

By

- ☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

## RETURN ON SERVICE:

- ☐
- Return receipt of certified mail received in this office on \_\_\_\_\_

- ☐ I certify that I personally delivered a copy of the Summons and Complaint to

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date \_\_\_\_\_

Server's Signature

Case Number:  
01-CV-2010-902180.00

CAMERON INTERNATIONAL CORPORATION, C/O CT CORP SYSTEMS 2 N JACKSON ST, STE 605, MONTGOMERY, AL 36104

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

- ☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

- ☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date \_\_\_\_\_

Clerk/Register

By

- ☒ Certified mail is hereby requested

/s/ MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

- ☐
- Return receipt of certified mail received in this office on \_\_\_\_\_

- ☐ I certify that I personally delivered a copy of the Summons and Complaint to

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date \_\_\_\_\_

Server's Signature

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS**  
- CIVIL -

Case Number:  
**01-CV-2010-902180.00**

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

ANADARKO PETROLEUM CORP., C/O CT CORP SYSTEMS 2 N JACKSON ST, STE605, MONTGOMERY, AL 36104

**NOTICE TO**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.  
TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM

/s ANNE-MARIE ADAMS

Date

Clerk/Register

By

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.

Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

Date

Server's Signature

State of Alabama Unified Judicial System Form C-34 Rev 6/88	<b>SUMMONS</b> <b>- CIVIL -</b>	Case Number: <b>01-CV-2010-902180.00</b>
---	------------------------------------	---

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
 SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

DRILQUIP, INC., ONE SHELL PLAZA 701 POYDRAS STREET, NEW ORLEANS, LA 70139

**NOTICE TO** \_\_\_\_\_

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
 pursuant to the Alabama Rules of the Civil Procedure

<u>1/17/2011 3:59:52 PM</u>	<u>/s ANNE-MARIE ADAMS</u>	
Date	Clerk/Register	By

☒ Certified mail is hereby requested /s MICHAEL SHANE LUCADO MR.  
 Plaintiffs/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_  
 \_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

<u>                    </u>	<u>  </u>	
Date	Server's Signature	



State of Alabama Unified Judicial System  Form C-34 Rev 6/88	<b>SUMMONS</b> <b>- CIVIL -</b>	Case Number: <b>01-CV-2010-902180.00</b>
---	------------------------------------	---

IN THE CIVIL COURT OF JEFFERSON, ALABAMA  
 SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

ANADARKO E & P CO, LP, C/O CT CORPORATION SYSTEM 2 N JACKSON ST, STE 605 MONTGOMERY, AL 36104

**NOTICE TO** \_\_\_\_\_

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MICHAEL SHANE LUCADO MR.

WHOSE ADDRESS IS 1 Perimeter Park South, Ste 125 S, BIRMINGHAM, AL 35243

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of PLASH ISLAND RESORT LLC  
 pursuant to the Alabama Rules of the Civil Procedure

1/17/2011 3:59:52 PM  
 Date

/s ANNE-MARIE ADAMS  
 Clerk/Register

By \_\_\_\_\_

☒ Certified mail is hereby requested

/s MICHAEL SHANE LUCADO MR.  
 Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_  
 \_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Server's Signature



## AlaFile E-Notice

01-CV-2010-902180.00

To: MICHAEL SHANE LUCADO MR.  
slucado@lucadolaw.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following answer was FILED on 1/17/2011 3:59:52 PM

Notice Date: 1/17/2011 3:59:52 PM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

To: DENNEY DAMON PATRICK  
420 20TH ST N STE 3400  
BIRMINGHAM, AL 35203

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following answer was FILED on 1/17/2011 3:59:52 PM

Notice Date: 1/17/2011 3:59:52 PM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

To: PLASH ISLAND RESORT LLC (PRO SE)  
C/O JOSEPH F YARBOROUGH  
374 WEST CANAL DRIVE  
GULF SHORES, AL 36542

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following answer was FILED on 1/17/2011 3:59:52 PM

Notice Date: 1/17/2011 3:59:52 PM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

To: JOSEPH JOE ALAN  
jjoseph@burr.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following answer was FILED on 1/17/2011 3:59:52 PM

Notice Date: 1/17/2011 3:59:52 PM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

To: MOSTELLER CLIFTON CHARLES  
clifton.mosteller@burr.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following answer was FILED on 1/17/2011 3:59:52 PM

Notice Date: 1/17/2011 3:59:52 PM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

To: BENTON LEE RIMES  
lbenton@bcattys.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following answer was FILED on 1/17/2011 3:59:52 PM

Notice Date: 1/17/2011 3:59:52 PM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

To: HAZELTON AMY MAY  
ahazelton@bcattys.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following answer was FILED on 1/17/2011 3:59:52 PM

Notice Date: 1/17/2011 3:59:52 PM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov





AlaFile E-Notice

01-CV-2010-902180.00

To: BARZE RONALD BRUCE JR  
bbarze@balch.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following answer was FILED on 1/17/2011 3:59:52 PM

Notice Date: 1/17/2011 3:59:52 PM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

To: ADAMS AMY DAVIS  
aadams@balch.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

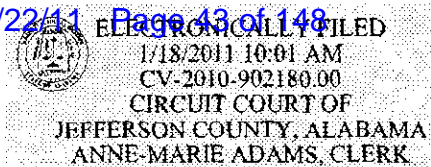
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following answer was FILED on 1/17/2011 3:59:52 PM

Notice Date: 1/17/2011 3:59:52 PM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM DIVISION**

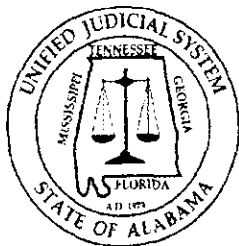
SYNOVUS BANK,	)	
Plaintiff,	)	
	)	
V.	)	Case No.: CV-2010-902180.00
	)	
PLASH ISLAND RESORT LLC,	)	
ROTENBERRY KEITH,	)	
LOCKHART LEWIS M.,	)	
ROWE RICHARD D. ET AL,	)	
Defendants.	)	

**ORDER**

The hearing on all pending motions previously set for Tuesday, March 15, 2011 at 8:30 a.m. is hereby continued to **Monday, March 21, 2011 at 8:30 a.m. Please mark your calendars accordingly.**

**DONE this 18<sup>th</sup> day of January, 2011.**

**/s ROBERT S. VANCE**  
**CIRCUIT JUDGE**



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: JOSEPH JOE ALAN  
jjoseph@burr.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

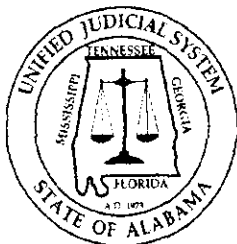
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: MOSTELLER CLIFTON CHARLES  
clifton.mosteller@burr.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: LUCADO MICHAEL SHANE  
slucado@lucadolaw.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BENTON LEE RIMES  
lbenton@bcattys.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: HAZELTON AMY MAY  
ahazelton@bcattys.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

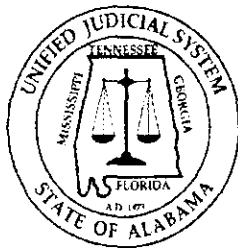
The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov





## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BARZE RONALD BRUCE JR  
bbarze@balch.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: ADAMS AMY DAVIS  
aadams@balch.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: DENNEY DAMON PATRICK  
420 20TH ST N STE 3400  
BIRMINGHAM, AL 35203

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: MOEX OFFSHORE 2007 (PRO SE)  
9 GREENWAY PLAZA  
HOUSTON, TX 77046

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: TRANSOCEAN OFFSHORE DEEPWATER DRILLING (PRO SE)  
C/O CT CORPORATION  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: TRANSOCEAN, LTD. (PRO SE)  
4 GREENWAY PLAZA  
HOUSTON, TX 77046

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BP, PLC (PRO SE)  
C/O CT CORP SYSTEMS  
1200 SOUTH PINE ISLAND RD  
PLANTATION, FL 33324

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: TRANSOCEAN DEEPWATER, INC (PRO SE)  
PARK TEN CENTRE  
1311BROADFIELD BLVDSTE400  
HOUSTON, TX 77084

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov





## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BP PRODUCTS NORTH AMERICA (PRO SE)  
C/O CSC LAWYERS INC SVC  
150 SOUTH PERRY STREET  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: TRANSOCEAN HOLDINGS, LLC (PRO SE)  
4 GREENWAY PLAZA, STE700  
HOUSTON, TX 77046

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: TRITON ASSET LEASING GMBH (PRO SE)  
24 GREENWAY PLAZA  
HOUSTON, TX 77046

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

*The following matter was FILED on 1/18/2011 10:01:49 AM*

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BP AMERICA INC. (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: HALLIBURTON (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BP AMERICA PRODUCTION CO. (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

*The following matter was FILED on 1/18/2011 10:01:49 AM*

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: M-I, LLC (PRO SE)  
C/O CAPITAL CORP SVCS, INC  
150 SOUTH PERRY STREET  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BP EXPLORATION & PRODUCTION INC (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov





## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: CAMERON INTERNATIONAL CORPORATION (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: ANADARKO PETROLEUM CORP. (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

*The following matter was FILED on 1/18/2011 10:01:49 AM*

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: DRILQUIP, INC. (PRO SE)  
ONE SHELL PLAZA  
701 POYDRAS STREET  
NEW ORLEANS, LA 70139

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: ANADARKO E & P CO, LP (PRO SE)  
C/O CT CORPORATION SYSTEM  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 1/18/2011 10:01:49 AM

Notice Date: 1/18/2011 10:01:49 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov

**Jan Myers**

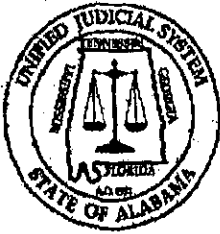
**From:** Jan Myers  
**Sent:** Monday, February 21, 2011 3:59 PM  
**To:** John Scott; Drake Blackmon  
**Subject:** Express Oil Change v. ANB, et al. - 26182 - FYI

Wade Bice of McGriff, Seibels & Williams, Inc. and Amy Parkman of Enrollment Advisors, Inc. have been served with their Subpoena to Testify at a Deposition in this case. When Brandon (Source One) brought the returns of service to me he said Amy Parkman told him she didn't know what this was about. He told her maybe we needed her to testify about her expertise. She said yes, must be expert testimony. He showed her where your names/numbers are at the bottom of the subpoena and told her to call y'all if she has any questions.

Chris couldn't serve the two at Willis of Alabama, Inc./HRH because they were closed today. He will go back to serve them in the morning.

Jan Myers, Secretary to  
John P. Scott, Jr. and Alfred H. Perkins, Jr.  
Starnes Davis Florie LLP  
P. O. Box 598512  
Birmingham, AL 35259-8512  
(205) 868-1806 (direct)  
(205) 868-6000 (main)  
(205) 868-6099 (fax)  
jmm@starneslaw.com

2/21/2011



## NOTICE TO CLERK

REQUIREMENTS FOR COMPLETING SERVICE BY  
CERTIFIED MAIL

JAN 19 2011

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA  
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

01-CV-2010-802180.00

To: CLERK BIRMINGHAM  
clerk.birmingham@alacourt.gov

*3rd Pty Compl.*

TOTAL POSTAGE PAID FOR CERTIFIED MAIL: \$130.68

Parties to be served by *Certified Mail - Return Receipt Requested*

MOEX OFFSHORE 2007  
8 GREENWAY PLAZA  
HOUSTON, TX 77048

*T1*

Postage: \$7.68

7009 1680 0001 9567 2720

TRANSOCEAN OFFSHORE DEEPWATER DRILLING  
C/O CT CORPORATION  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

*T2*

Postage: \$7.68

7009 1680 0001 9567 2737

TRANSOCEAN, LTD.  
4 GREENWAY PLAZA  
HOUSTON, TX 77048

*T3*

Postage: \$7.68

7009 1680 0001 9567 2744

BP, PLC  
C/O CT CORP SYSTEMS  
1200 SOUTH PINE ISLAND RD  
PLANTATION, FL 33324

*T4*

Postage: \$7.68

7009 1680 0001 9567 2751

TRANSOCEAN DEEPWATER, INC  
PARK TEN CENTRE  
1311 BROADFIELD BLVD STE 400  
HOUSTON, TX 77084

*T5*

Postage: \$7.68

7009 1680 0001 9567 2768

BP PRODUCTS NORTH AMERICA  
C/O CSC LAWYERS INC SVC  
150 SOUTH PERRY STREET  
MONTGOMERY, AL 36104

*T6*

Postage: \$7.68

7009 1680 0001 9567 2775

TRANSOCEAN HOLDINGS, LLC  
4 GREENWAY PLAZA, STE 700  
HOUSTON, TX 77048

T7

Postage: \$7.68

7009 1680 0001 9567 2782

TRITON ASSET LEASING GMBH  
24 GREENWAY PLAZA  
HOUSTON, TX 77048

T8

Postage: \$7.68

7009 1680 0001 9567 2799

BP AMERICA INC.  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

T9

Postage: \$7.68

7009 1680 0001 9567 2812

HALLIBURTON  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

T10

Postage: \$7.68

7009 1680 0001 9567 2867

BP AMERICA PRODUCTION CO.  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

T11

Postage: \$7.68

7009 1680 0001 9567 2805

M-I, LLC  
C/O CAPITAL CORP SVCS, INC  
150 SOUTH PERRY STREET  
MONTGOMERY, AL 36104

T12

Postage: \$7.68

7009 1680 0001 9567 2850

BP EXPLORATION & PRODUCTION INC  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

T13

Postage: \$7.68

7009 1680 0001 9567 2843

CAMERON INTERNATIONAL CORPORATION  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

T14

Postage: \$7.68

7009 1680 0001 9567 2874

ANADARKO PETROLEUM CORP.  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

T15

Postage: \$7.68

7009 1680 0001 9567 2836

DRILQUIP, INC.  
ONE SHELL PLAZA  
701 POYDRAS STREET  
NEW ORLEANS, LA 70139

T16

Postage: \$7.68

7009 1680 0001 9567 2829

ANADARKO E & P CO, LP  
C/O CT CORPORATION SYSTEM  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

Postage: \$7.68

717

7009 1680 0001 9567 2881

Parties to be served by Certified Mail - Restricted Delivery - Return Receipt Requested





2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

800 592 9023 tel  
www.ctlegalsolutions.com

C

**COPY**

January 20, 2011

Robert S. Vance, Jr.  
330 Jefferson County Courthouse,  
Birmingham, AL 35203

Re: Synovus Bank, Pltf. vs. Plash Island Resort LLC, et al., Dfts. // To: Transocean Offshore Deepwater Drilling

Case No. CV-2010-902180.00

Dear Sir/Madam:

We are herewith returning the Notice, Order which we received regarding the above captioned matter.

T 002

~~Transocean Offshore Deepwater Drilling is not listed on our records or on the records of the State of AL~~

Very truly yours,

*Laura Payne*

Laura Payne  
CT Rep

Log# 517903074

FedEx Tracking# 790732820267

cc: Jefferson County Circuit Court  
Jefferson Co. Courthouse Room 400,  
716 Richard Arrington, Jr. Blvd North,  
Birmingham, AL 35203

FILED IN OFFICE

JAN 24 2011

ANNE-MARIE ADAMS  
Clerk



2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

800 592 9023 tel  
www.ctlegalsolutions.com

C

**COPY**

~~January 20, 2011~~

Robert S. Vance, Jr.  
330 Jefferson County Courthouse,  
Birmingham, AL 35203

Re: Synovus Bank, Pltf. vs. Plash Island Resort LLC, et al., Dfts. // To: Transocean Offshore Deepwater Drilling

Case No. CV-2010-902180.00

Dear Sir/Madam:

We are herewith returning the Notice, Order which we received regarding the above captioned matter.

T 002

~~Transocean Offshore Deepwater Drilling is not listed on our records or on the records of the State of AL~~

Very truly yours,

*Laura Payne*

Laura Payne  
CT Rep

Log# 517903074

FedEx Tracking# 790732820267

cc: Jefferson County Circuit Court  
Jefferson Co. Courthouse Room 400,  
716 Richard Arrington, Jr. Blvd North,  
Birmingham, AL 35203

FILED IN OFFICE

JAN 24 2011

ANNE-MARIE ADAMS  
Clerk



2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

800 592 9023 tel  
www.ctlegalsolutions.com

January 20, 2011

**COPY**

Robert S. Vance, Jr.  
10th Judicial Circuit of Alabama  
330 Jefferson County Courthouse,  
Birmingham, AL 35203

Re: Synovus Bank, Pltff. vs. Plash Island Resort LLC, et al., Dfts. // To: Halliburton

Case No. CV-2010-902180

Dear Sir/Madam:

We are herewith returning the Notice, Order which we received regarding the above captioned matter.

~~Our records indicate that we represent more than one entity beginning with the name Halliburton. In order~~  
that we may properly process the enclosed documents(s), we must be provided with the full name of the entity  
for which it is intended.

Should you make this determination, please note the full name of the entity on the envelope, return the  
document(s) to us and we will be glad to forward it on.

Very truly yours,

A handwritten signature in cursive script that reads "Laura Payne".

Laura Payne  
CT Rep

Log# 517901591

FedEx Tracking# 790240987003

cc: Jefferson County Circuit Court  
Jefferson Co. Courthouse Room 400,  
716 Richard Arrington, Jr. Blvd North,  
Birmingham, AL 35203

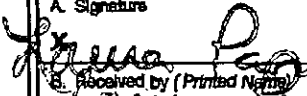

**FILED IN OFFICE**

**JAN 24 2011**

**ANNE-MARIE ADAMS**  
Clerk

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>Signature <u>J. B. H.</u> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <u>JAMES S. BELAMY</u> C. Date of Delivery <u>FEB 24 2011</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p><u>T 12</u> <u>CV 10-902150</u></p>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>M-I, LLC C/O CAPITAL CORP SVCS, INC 150 SOUTH PERRY STREET MONTGOMERY, AL 36104</p> </div>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label)</p> <p><u>7009 1680 0001 9567 2850</u></p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102586-02-M-1840</p>			



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return this card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature  </p> <p><input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;">           BP AMERICA PRODUCTION CO.            C/O CT CORP SYSTEMS            2 N JACKSON ST, STE605            MONTGOMERY, AL 36104         </div>		<p>B. Received by (Printed Name)   </p> <p>C. Date of Delivery            2/24/11         </p>	
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes            If YES, enter delivery address below: <input type="checkbox"/> No</p> <p style="text-align: center; font-size: 1.5em;">T 11</p> <p style="font-size: 1.2em;">CV10-902180-3<sup>rd</sup> P4</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> O.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number            (Transfer from service label)</p>		<p>7009 1680 0001 9567 2805</p>	
PS Form 3811, February 2004		Domestic Return Receipt 102583-02-M-1840	



UNITED STATES POSTAL SERVICE

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. 1910

05 JAN 2011 PM 3

• Sender: Please print your name, address, and ZIP+4 in this box •

FILED IN OFFICE

JAN 27 2011

ANNE-MARIE ADAMS, CLERK  
ROOM 400 JEFF. CO. COURTHOUSE  
716 RICHARD ARRINGTON JR BLVD. N  
BIRMINGHAM, ALABAMA 35203  
ANNE-MARIE ADAMS  
Clerk

101



**A**

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <i>Johna Page</i></p> <p>B. Received by (Printed Name) <i>Johna Page</i></p> <p>C. Date of Delivery <i>1/29/11</i></p> <p>D. Is delivery address different from Item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p><i>NO</i></p> <p><i>OID-902150-3000</i></p>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>HALLIBURTON C/O CT CORP SYSTEMS 2 N JACKSON ST, STE605 MONTGOMERY, AL 36104</p> </div>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>7009 1680 0001 9567 2867</p>			

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540



UNITED STATES POSTAL SERVICE

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender. Please print your name, address, and ZIP+4® in this box.

FILED IN OFFICE

JAN 27 2011

ANNE-MARIE ADAMS, CLERK  
ROOM 400 JEFF. CO. COURTHOUSE  
716 RICHARD ARRINGTON JR BLVD. NO.  
BIRMINGHAM, ALABAMA 35203  
ANNE-MARIE ADAMS  
Clerk



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

ANADARKO E & P CO, LP  
C/O CT CORPORATION SYSTEM  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

## 2. Article Number

(Transfer from service label)

PS Form 3811, February 2004

COMPLETE THIS SECTION ON DELIVERY

Signature Rhonda Payne ☐ Agent  
☐ Addressee  
B. Received by (Printed Name) Rhonda Payne C. Date of Delivery 2/24/11  
D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

## 3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

7009 1680 0001 9567 2881

Domestic Return Receipt

585-02-M-1940



UNITED STATES POSTAL SERVICE

26 JAN 2011 PM 4

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. 8-10

• Sender. Please print your name, address and ZIP+4 in this box •



FILED IN OFFICE

JAN 27 2011

ANNE-MARIE ADAMS, ~~NAME~~ ANNE-MARIE ADAMS  
ROOM 400 JEFF. CO. COURTHOUSE  
716 RICHARD ARRINGTON JR BLVD. N.E.  
BIRMINGHAM, ALABAMA 35203



101

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature  </p> <p><input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p>		<p>B. Received by (Printed Name)  </p> <p>C. Date of Delivery  1/24/11</p>	
<p>2. Article Number  (Transfer from service label)</p>		<p>D. Is delivery address different from item 1?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  If YES, enter delivery address below:</p>	
<p>TRANSOCEAN OFFSHORE DEEPWATER DRILLING  C/O CT CORPORATION  2 N JACKSON ST, STE 605  MONTGOMERY, AL 36104</p>		<p>T 2  CV10-902180-342P</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input checked="" type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>7009 1680 0001 9567 2737</p>			
<p>PS Form 3811, February 2004</p>		<p>Domestic Return Receipt 102595-02-M-1540</p>	



UNITED STATES POSTAL SERVICE

26 JAN 2011 PM 4 12

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP code in this box •

FILED IN OFFICE

JAN 27 2011

ANNE-MARIE ADAMS, CLERK  
ROOM 400 JEFF. CO. COURTHOUSE  
716 RICHARD ARRINGTON JR BLVD. NW  
BIRMINGHAM, ALABAMA 35203

ANNE-MARIE ADAMS  
Clerk

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>[Signature]</i> C. Date of Delivery <i>1/24/11</i></p>	
<p>1. Article Addressed to:</p> <p><b>BP EXPLORATION &amp; PRODUCTION INC</b>  <b>C/O CT CORP SYSTEMS</b>  <b>2 N JACKSON ST, STE605</b>  <b>MONTGOMERY, AL 36104</b></p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p> <p><i>T13</i></p> <p><i>CVID 902180-32244</i></p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number (Transfer from service label)</p>		<p><b>7009 1660 0001 9567 2843</b></p>	
PS Form 3811, February 2004		Domestic Return Receipt	
		102588-02-M-1540	

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box.

FILED IN OFFICE

JAN 27 2011

ANNE-MARIE ADAMS, CLERK  
ROOM 400 JEFF. CO. COURTHOUSE  
716 RICHARD ARRINGTON JR BLVD. NO.  
BIRMINGHAM, ALABAMA 35203

Clerk





SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>[Signature]</i></p>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>TRANSOCEAN, LTD.</p> <p>4 GREENWAY PLAZA</p> <p>HOUSTON, TX 77046</p> </div>		<p>B. Received by (Printed Name) C. Date of Delivery</p> <p><i>P. J. Neegs</i> <i>1/24/04</i></p>	
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p> <p style="text-align: center;">T 3</p> <p style="text-align: center;">CV 10-902180-320 Pty</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, February 2004</p>		<p>Domestic Return Receipt</p>	

7009 1680 0001 9567 2744

102535-02-M-1840



HOUSTON TX 770  
UNITED STATES POSTAL SERVICE

24 JAN 2011 PM 2 7



First-Class Mail  
Postage & Fees Paid  
USPS 770  
Permit No. 6710

• Sender: Please print your name, address, and phone number in this box •

FILED IN OFFICE

JAN 27 2011

ANNE-MARIE ADAMS, CLERK  
ROOM 400 JEFF. CO. COURTHOUSE  
716 RICHARD ARRINGTON JR BLVD  
BIRMINGHAM, ALABAMA 35203  
Clerk

01



UNITED STATES POSTAL SERVICE



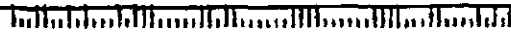
First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

**FILED IN OFFICE**

**JAN 27 2011**

ANNE-MARIE ADAMS, CLERK  
ROOM 400 JEFF. CO. COURTHOUSE  
716 RICHARD ARRINGTON JR BLVD. I  
BIRMINGHAM, ALABAMA 35203  
**ANNE-MARIE ADAMS**  
**Clerk**



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature  <input checked="" type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> MOEX OFFSHORE 2007  9 GREENWAY PLAZA  HOUSTON, TX 77046 </div>		<p>B. Received by (Printed Name) C. Date of Delivery  1-24-11</p>	
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p> <p style="text-align: center;">T1</p> <p style="text-align: center;">CV10-902180-3<sup>RD</sup> P4</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number  (Transfer from service label)</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>7009 1680 0001 9567 2720</p>			
PS Form 3811, February 2004		Domestic Return Receipt	
		102595-02-M-1540	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>[Signature]</i></p>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>TRANSOCEAN HOLDINGS, LLC 4 GREENWAY PLAZA, STE700 HOUSTON, TX 77048</p> </div>		<p>B. Registered by (Printed Name) <i>F. H. Regus</i> C. Date of Delivery <i>1-24-2011</i></p>	
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p> <p style="text-align: center; font-size: 1.5em;">T7</p> <p style="text-align: center; font-size: 1.5em;">CV10-902180-38PH</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>7009 1680 0001 9567 2782</p>			
PS Form 3811, February 2004		Domestic Return Receipt 102536-02-M-1640	





SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse, so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature  <i>Adina Pagan</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;">           BP AMERICA INC.            C/O CT CORP SYSTEMS            2 N JACKSON ST, STE 605            MONTGOMERY, AL 36104         </div>		<p>B. Received by (Printed Name)  <i>Adina Pagan</i> C. Date of Delivery  <i>1/24/11</i></p>	
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below: <input type="checkbox"/> No</p> <p style="text-align: center;">T9</p> <p style="text-align: center;">CV10-902180 - 3<sup>rd</sup> FL</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number          (Transfer from service label)</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, February 2004</p>		<p>7009 1680 0001 9567 2812</p> <p>Domestic Return Receipt</p>	

02535-02-M-1640



UNITED STATES POSTAL SERVICE

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

FILED IN OFFICE

JAN 27 2011

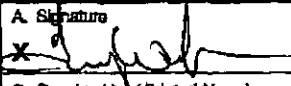
ANNE-MARIE ADAMS, CLERK

ROOM 400 JEFF. CO. COURTHOUSE

716 RICHARD ARRINGTON JR BLVD. N

BIRMINGHAM, ALABAMA 35203

ANNE-MARIE ADAMS  
Clerk

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature   <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>TRANSOCEAN DEEPWATER, INC  PARK TEN CENTRE  1311 BROADFIELD BLVD STE 400  HOUSTON, TX 77084</p> </div>		<p>B. Received by (Printed Name) _____ C. Date of Delivery  1/24/11</p>	
<p>2. Article Number  (Transfer from service label)</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p> <p style="text-align: center; font-size: 1.5em;">T5</p> <p style="text-align: center; font-size: 1.2em;">CV10-902180-342 PH</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>7009 1680 0001 9567 2768</p>			
<p>PS Form 3811, February 2004</p>		<p>Domestic Return Receipt 102596-02-M-1040</p>	



UNITED STATES POSTAL SERVICE



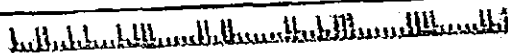
First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and phone number in this box.

**FILED IN OFFICE**

**JAN 28 2011**

ANNE-MARIE ADAMS, CLERK  
ROOM 400 JEFF. CO. COURTHOUSE  
716 RICHARD ARRINGTON JR BLVD. NO.  
BIRMINGHAM, ALABAMA 35203  
**ANNE-MARIE ADAMS**  
**Clerk**



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <i>Raina Pagan</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Raina Pagan</i> C. Date of Delivery <i>1/11</i></p> <p>D. Is delivery address different from Item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>1. Article Addressed to:</p> <p>CAMERON INTERNATIONAL CORPORATION C/O CT CORP SYSTEMS 2 N JACKSON ST, STE 605 MONTGOMERY, AL 36104</p>		<p>T14 CV10-902180-3<sup>RD</sup> PL</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>7009 1680 0001 9567 2874</p>	
PS Form 3811, February 2004		Domestic Return Receipt 102836-02-00-1540	







2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

800 592 9023 tel  
www.ctlegalsolutions.com

FILED IN OFFICE

January 25, 2011

JAN 26 2011

ANNE-MARIE ADAMS  
Clerk

**COPY**

Michael Shane Lucaddo Mr.  
Lucado Law Firm  
One Perimeter Park South,  
Suite 125 S,  
Birmingham, AL 35243

Re: Synovus Bank, Pltf. vs. Plash Island Resort, LLC, et al., Dfts./Third Party Pltf. v. BP P.L.C., et al.  
including Transocean Offshore Deepwater Drilling, Third - Party Dfts.

Case No. 01-CV-2010-902180.00

Dear Sir/Madam:

We are herewith returning the Notice, Summons (2sets), Complaint, Certificate of Service, Service List which  
we received regarding the above captioned matter.

T002

Transocean Offshore Deepwater Drilling is not listed on our records or on the records of the State of AL.

Very truly yours,

A handwritten signature in cursive script that reads 'Laura Payne'.

Laura Payne  
CT Rep

Log# 517925780

FedEx Tracking# 790732997683

cc: Jefferson County Circuit Court  
Jefferson Co. Courthouse Room 400,  
716 Richard Arrington, Jr. Blvd North,  
Birmingham, AL 35203

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p><i>JAN 26 2011</i></p> <p><i>JAMES S. BELLAM</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>BP PRODUCTS NORTH AMERICA C/O CSC LAWYERS INC SVC 150 SOUTH PERRY STREET MONTGOMERY, AL 36104</p> </div>		<p>b. Is delivery address <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address <i>T6</i></p> <p><i>CVIU -902480 -3ND</i></p>	
<p>2. Article Number (Transfer from service label)</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>7009 3680 0001 9567 2775</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, February 2004</p>		<p>Domestic Return Receipt 10255-02-M-1340</p>	



UNITED STATES POSTAL SERVICE

First-Class Mail  
Postage & Fees Paid  
13922  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this area.

**FILED IN OFFICE**

**JAN 27 2011**

ANNE-MARIE ADAMS, CLERK  
ROOM 400 JEFF. CO. COURTHOUSE  
716 RICHARD ARRINGTON JR BLVD  
BIRMINGHAM, ALABAMA 35203

**ANNE-MARIE ADAMS**  
**Clerk**



 CT Corporation

1200 S. Pine Island Road  
Plantation, FL 33324

954 473 5503 tel  
www.ctlegalsolutions.com

FILED IN OFFICE

JAN 27 2011

**ANNE-MARIE ADAMS**  
Clerk

January 24, 2011

Anne-Marie Adams, Clerk  
Jefferson County Courthouse  
Room 400,  
716 Richard Arrington Jr Blvd. No.,  
Birmingham, AL 35203

Re: Synovus Bank, Pltf. vs. Plash Island Resort, LLC, et al., Dft., Plash Island Resort, LLC, Dft./Third Party  
Pltf. v. BP, P.L.C., et al., Dfta.

Case No. CV-2010-902180.00

Dear Madam:

We are herewith returning the Notice, Summons (2 sets), Third Party Complaint, Certificate of Service, List  
which we received regarding the above captioned matter.

TA  
BP, P.L.C. is not listed on our records or on the records of the State of FL.

Very truly yours,



Ingrid Thornhill  
Process Specialist

Log# 517926341

FedEx Tracking# 794352100160

cc: Anne-Marie Adams, Clerk  
Jefferson County Courthouse,  
716 Richard Arrington Jr Blvd. No.,  
Room 400,  
Birmingham, AL 35203



ELECTRONICALLY FILED  
1/28/2011 4:14 PM  
CV-2010-902180.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

**IN THE CIRCUIT COURT FOR JEFFERSON COUNTY, ALABAMA**

**SYNOVUS BANK**

**Plaintiff,**

**v.**

**PLASH ISLAND RESORT, LLC, et al.**

**Defendants.**

**PLASH ISLAND RESORT, LLC**

**Defendant/Third Party Plaintiff,**

**v.**

**BP P.L.C.; BP AMERICA INC.; BP  
PRODUCTS NORTH AMERICA, INC.;  
BP AMERICA PRODUCTION  
COMPANY; BP EXPLORATION &  
PRODUCTION INC.; ANADARKO  
PETROLEUM CORPORATION;  
ANADARKO E&P COMPANY, LP;  
MOEX OFFSHORE 2007, LLC;  
TRANSOCEAN LTD.; TRANSOCEAN  
DEEPWATER, INC.; TRANSOCEAN  
OFFSHORE DEEPWATER DRILLING,  
INC.; TRANSOCEAN HOLDINGS,  
LLC; TRITON ASSET LEASING  
GMBH; HALLIBURTON ENERGY  
SERVICES, INC.; M-I, LLC;  
DRILQUIP, INC.; CAMERON  
INTERNATIONAL CORPORATION  
F/K/A COOPER CAMERON  
CORPORATION; JOHN AND JANE  
DOES A-Z; and CORPORATIONS A-Z**

**Third Party Defendants.**

**Case No. 2010-902180, previously  
consolidated with CV-2010-902186**



**MOTION TO SEVER THIRD PARTY COMPLAINT AND REQUEST FOR HEARING**

**COMES NOW** Plaintiff, Synovus Bank, formerly known as Columbus Bank and Trust Company, as successor in interest through name change and by merger with Coastal Bank and Trust of Florida, d/b/a Coastal Bank and Trust (collectively "Synovus" or "Plaintiff"), by and through its undersigned counsel, and hereby moves the Court to sever the third-party complaint (the "Third Party Complaint") filed by Defendant Plash Island Resort, LLC, ("Plash Resort") on January 17, 2011 in the above styled matter. In further support of this motion (the "Motion"), Synovus shows unto the Court as follows:

**BACKGROUND**

1. On June 21, 2010, Synovus filed its complaint against the original Defendants in this matter alleging that they breached the terms of their respective contracts with Synovus, more specifically, that Defendant Plash Resort failed to pay Synovus the outstanding balance owed on a defaulted and matured loan, and that the remaining original Defendants have breached the terms of their respective continuing and unlimited guaranty agreements for failure to pay the same.

2. On January 14, 2011, Synovus filed a motion for summary judgment against all the original Defendants which had appeared in the case. The Court has set this motion for a hearing on March 15, 2011.

3. Also on January 14, 2011, Synovus filed a motion for default judgment against Plash Resort in light of its failure to respond to Synovus' complaint within the requisite time period established in the *Alabama Rules of Civil Procedure*.

4. On January 17, 2011, Plash Resort filed its Third Party Complaint against numerous third party defendants ("Third Party Defendants") alleging liability solely based on tort claims related to the "Deepwater Horizon oil spill in the Gulf of Mexico" which occurred on April 20, 2010.

5. Synovus is not a party to the Third Party Complaint and is not included in Plash Resort's list of Third Party Defendants.

6. The remaining original Defendants, the guarantors of the Plash Resort Loan, are not parties to the Third Party Complaint, nor are they included in Plash Resort's list of Third Party Defendants.

## LEGAL ARGUMENT

### **I. Severance of the Third Party Complaint is Appropriate By the Very Terms of Rule 14.**

The authority for third-party practice is rooted in Rule 14 of the Alabama Rules of Civil Procedure. Rule 14(a), *When Defendant May Bring in Third Party*, states, in pertinent part:

At any time after commencement of the action a defending party, as a third-party plaintiff, may cause a summons and complaint to be served upon a person not a party to the action who is or may be liable to the third-party plaintiff for all or part of the plaintiff's claim against the third-party plaintiff.

(emphasis added) Ala. R. Civ. Pro 14(a). However, Rule 14, by its very terms, provides authority for severance of such claims wherein it states, "[a]ny party may move to strike the third-party claim, or for its severance or separate trial." *Id. See also Ex parte Athens-Limestone Hosp.*, 858 So.2d 960, 963 (Ala. 2003) ("A trial court has discretion in deciding whether to sever a third-party claim, and the Supreme Court will not overturn the trial court's order unless the trial court exceeded the permissible limits of its discretion.")

With respect to severing claims, the Alabama Supreme Court reiterated in *Ex parte Duncan Constr. Co.*, that “[i]n ruling on a motion to strike or sever, the trial court must weigh the need for one trial involving all issues and parties in furtherance of the stated purpose of [Rule 14] against the risk of substantial prejudice to the original parties resulting from an undue complication of issues and evidence because of the addition of the third-party defendants.” 460 So.2d 852, 854 (Ala. 1984). The stated purpose of third-party practice under Rule 14 is “to avoid multiple suits, to allow an entire controversy to be disposed of in one action, thereby saving time and cost and avoiding the serious handicap to the defendant of a time difference between the judgment against him and the judgment in his favor against the party liable over to him.” *Ex parte Athens-Limestone Hosp.* 858 So.2d 960, 964 Ala.,2003 *citing Duncan Construction*, 460 So.2d at 854 (*quoting Ozley v. Guthrie*, 372 So.2d 860, 861 (Ala.1979); *see also* Committee Comments on 1973 Adoption, Rule 14, Ala. R. Civ. P.

Plash Resort's Third Party Complaint, by no means, serves to promote the stated purpose of Rule 14, and in fact, does just the opposite. First, by its very nature, third-party practice affords a defending party the opportunity to join a party to a pending action "who is or may be liable to the third-party plaintiff for all or part of the plaintiff's claim against the third-party plaintiff." Here, Plash Resort does not allege that the Third-Party Defendants are liable to it for the claims sought by Synovus, nor can it. It is a simple reality that the repercussions, if any, from the Deepwater Horizon Oil Spill had nothing to do with the original Defendants' default on the Synovus Loan.

Second, the risk of substantial prejudice to the original parties heavily outweighs the need for one trial involving all issues asserted in this matter. As referenced above, Synovus' complaint and motion for summary judgment asserts claims and seeks damages sounding solely in contract

and relating strictly to the outstanding Loan at issue in this matter. Plash Resort's Third Party Complaint, on the other hand, asserts claims sounding exclusively in tort<sup>1</sup> and "seeks to compensate [Plash Resort] for their injuries and damages suffered, including but not limited to, diminution of property value and loss of income, as a result of the *Deepwater Horizon Oil Spill*." (emphasis original).

Similarly, testimony and evidence with respect to Synovus' claims will focus exclusively on the contractual relationships between the original parties, and breach thereof.<sup>2</sup> Conversely, Plash Resort's Third Party claims will require a long drawn out discovery process all as to the proximate cause of the loss, if any, and alleged damages, if any, sustained by the property whose only link to Synovus is that it serves as collateral to the underlying Loan at issue in this case. These Third Party claims, by necessity, will require a substantial amount of expert testimony in addition to specific fact testimony on the extremely complicated issues involved. The necessary witness will have no bearing on Synovus' claims whatsoever and will not be able to provide any pertinent or relevant facts relating to the straight forward breach of contract case filed by Synovus. In other words, the best interests of the parties and the interest of justice and judicial efficiency dictate that this Court sever Plash Resort's Third Party Complaint from the pending action as the tort claims alleged in the Third Party Complaint will require a substantially unique discovery process none of which relates to the ultimate issue in Synovus' motion for summary judgment, i.e. did the original Defendants breach the terms of their respective contract with Synovus.

---

<sup>1</sup> None of which are asserted against the original parties to this action.

<sup>2</sup> Synovus submits that there is ample evidence already in the record for this Court to rule on the merits of its claim, hence the filing of its motion for summary judgment.

Moreover, the failure to sever the Third Party Complaint will further prejudice Synovus in light of the very real possibility that this action could be removed and transferred to U.S. District Court for the Eastern District of Louisiana where it would be consolidated with numerous other Oil Spill related cases, adding increased, yet unneeded, time and expense. Furthermore, because the respective complaints involve determinations of completely separate questions of law and fact (and different parties), there is no risk of inconsistent judgments as any decisions reached by the Court as to the Synovus' claims, will have no effect on the Third Party claims. Although the prejudice to Synovus is readily apparent, severance of the Third Party Complaint would not prejudice Plash Resort because the severance of claims does not preclude a third-party plaintiff from proceeding against the additional defendants in a separate action created by the severance. *See Key v. Robert M. Duke Ins. Agency*, 340 So. 2d 781 (Ala. 1976). In short, Rule 14, and the stated purpose behind the same, favor complete severance of the Third Party Complaint.

## **II. The Third Party Complaint Misjoins the Third Party Defendants to This Action and Thus Severance of Said Complaint is Required.**

As additional grounds for a true severance of the Third Party Complaint, Synovus draws the Court's attention to Rule 21 of the Alabama Rules of Civil Procedure, which provides that, "[p]arties may be dropped or added by order of the court on motion of any party or of its own initiative at any stage of the action and on such terms as are just. Any claim against a party may be severed and proceeded with separately." (emphasis added) Rule 21, Ala.R. Civ. P. By and through this Motion, Synovus seeks a true severance of the Third Party Complaint. "Severance" divides a lawsuit into two or more independent causes, each of which results in separate, final and enforceable judgment. To effectuate true severance, a judge should explicitly direct the

clerk to docket a new civil action and should explain how the new case should be styled. *See Opinion of the Clerk, Supreme Court of Alabama*, 526 So. 2d 584 (Ala. 1988). *See also New Acton Coal Mining Co., Inc. v. Woods*, 49 So.3d 181, FN4 (Ala. 2010) ("A significant distinction exists between an order separating trials under Rule 42(b) and one severing claims under Rule 21 because 'severed claims become independent actions with judgments entered independently, while separate trials lead to one judgment.'"); *Key v. Robert M. Duke Ins. Agency*, 340 So. 2d 781 (Ala. 1976) (An order of severance creates a new action and a final order in the severed claim is immediately appealable regardless of the status of the finality of claims in the proceeding from which the case was severed. An order granting a separate trial, not a severance, does not have such effect.)

Rule 21, *Misjoinder and Nonjoinder of Parties*, is the procedural counter-part to Rule 20 of the Alabama Rules of Civil Procedure. Rule 20(a), in its pertinent part, states that "[a]ll persons may be joined in one action as defendants if there is asserted against them jointly, severally, or in the alternative, any right to relief in respect of or arising out of the same transaction, occurrence, or series of transactions or occurrences and if any question of law or fact common to all defendants will arise in the action...." (emphasis added) Rule 20, Ala.R. Civ. P.

Thus, "[i]n order to join defendants pursuant to Rule 20(a), both requirements imposed by the rule must be met: (1) the plaintiff must assert against each defendant a 'right to relief in respect of or arising out of the same transaction, occurrence, or series of transactions or occurrences,' and (2) there will arise in the action 'any question of law or fact common to all defendants.' A misjoinder occurs if either of the Rule 20(a) requirements is not satisfied. Rule 21 provides for severance of claims if joinder of the claims was improper under Rule 20." (emphasis added) *Ex parte Novartis Pharmaceuticals Corp.*, 975 So.2d 297, 299 (Ala. 2007).

*See also, Ex parte Alfa Life Ins. Corp.*, 923 So.2d 272 (Ala 2005) ("In exercising its discretion in deciding whether to sever claims, the trial court should consider the prejudice that may result to the parties if the claims are severed. Considerations of practicality, judicial economy, and the possibility of inconsistent results are also relevant in that regard."); *Ex parte Rudolph*, 515 So.2d 706 (Ala. 1987) ("[t]hough the rules allow virtually unlimited joinder of parties, the Committee Comments to Rule 20 make it clear that the trial court has 'ample powers, under Rules 20(b), 21 and 42(b), to ensure that the trial is conducted in the most convenient and least prejudicial manner.'")

Although "there is no absolute rule for determining what constitutes a series of transactions or occurrences", *Id.*, it is clear from the face of the Third Party Complaint that the events giving rise to Plash Resort's third party claims, negligence and strict liability resulting the Deepwater Horizon Oil Spill, do not arise out of the same transaction which gave rise to Synovus' claims, i.e. the breach of various Loan Documents.

In a case similar to the one at hand, at least procedurally, the Alabama Supreme Court upheld the trial court's decision to sever tort claims filed in an underlying breach of contract dispute because of the lack of nexus between the facts surrounding the claims. In *Ex parte Am. Heritage Life Ins. Co.*, 46 So. 3d 474, 480-81 (Ala. 2010), the Court stated "[h]ere, there is little, if any, commonality between the claim against Garth and those against AHLIC. The claims against AHLIC assert claims sounding in contract, while the claim against Garth sounds in tort. The genesis of Day's claim against Garth is Garth's tortious assault and battery on Day, while the genesis of the claims against AHLIC is Day's purchase of the accident-plan insurance policy from AHLIC." Similarly, and as discussed above, Synovus' complaint and motion for summary judgment asserts claims and seeks damages sounding solely in contract and relating strictly to the

outstanding Loan at issue in this matter, whereas Plash Resort's Third Party Complaint asserts claims sounding exclusively in tort and relating to a catastrophic event which occurred months after Plash Resort's default on the Loan. Moreover, the Committee Comments to Rule 20 state that that rule "is intended to promote trial convenience, prevent a multiplicity of suits, and expedite the final determination of litigation by inclusion in one suit of all parties directly interested in the controversy." *See also S.E.B. v. J.H.B.*, 605 So.2d 1230, 1232 (Ala. Civ. App. 1992). For the reasons stated above, the Third Party Complaint flies in the face of the purpose of Rule 20, as it does with Rule 14.

In light of the foregoing, Synovus seeks an Order from this Court severing the Third Party Complaint from this action and instructing the clerk to docket a new civil action number for the matter. Alternatively, in the event this Court finds that the authority cited above, and the circumstances surrounding the claims asserted in this matter, do not justify a true severance, Synovus, pursuant to Rule 42(b) of the Alabama Rules of Civil Procedure and the reasons stated above, seeks an Order from this court establishing separate scheduling orders and trials for the two Complaints.<sup>3</sup>

**WHEREFORE**, based on the foregoing, Synovus moves the Court to enter an Order severing the Third-Party Complaint from the instant action and instructing the Clerk to establish a new civil action number for the same; alternatively, if a true severance is not warranted, Synovus requests and Order establishing separate scheduling orders and trials for the two Complaints.

DATED this the 28th day of January, 2011:

---

<sup>3</sup> The Committee Comments to Rule 42 states that "Ala. R. Civ. P. Rule 42(b) gives the trial court a virtually unlimited freedom to order separate trials of claims, issues, or parties, as may seem dictated by convenience and the desire to avoid prejudice."



/s/ Clifton C. Mosteller

Joe A. Mosteller (JOS004)  
Clifton C. Mosteller (MOS035)  
Burr & Forman LLP  
420 North 20th Street  
3400 Wachovia Tower  
Birmingham, Alabama 35203

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document on the following by Notice of Electronic Filing, or, if the party served does not participate in Notice of Electronic Filing, by placing the same in postage-prepaid U.S. First Class Mail, by hand delivery, by fax, or by email on this the 28th day of January 2011:

Lee R. Benton  
Amy Hazelton  
2019 3rd Ave N  
Birmingham, Alabama 35203

Moex Offshore 2007, LLC  
9 Greenway Plaza  
Houston, TX 77046

BP, plc  
c/o CT Corporation System,  
The Corporation Company  
1200 South Pine Island Road  
Plantation, FL 33324

Halliburton  
c/o CT Corporation Systems  
2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

Transocean Offshore  
Deepwater Drilling  
c/o CT Corporation  
2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

Plash Island Resort LLC  
c/o Joseph F. Yarborough, Jr.  
396 West 23rd Avenue  
Gulf Shores, AL 36542

Transocean, Ltd.  
4 Greenway Plaza  
Houston, TX 77046

BP Products North America  
c/o CSC Lawyers  
Incorporating Service  
150 South Perry Street  
Montgomery, AL 36104

BP America Production Co.  
c/o CT Corporation Systems  
2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

Anadarko Petroleum Corp.  
c/o CT Corporation Systems  
2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

Transocean Deepwater, Inc.  
Park Ten Centre, Suite 400  
1311 Broadfield Boulevard  
Houston, TX 77084

Triton Asset Leasing GmbH  
24 Greenway Plaza  
Houston, TX 77046

BP America, Inc.  
c/o CT Corporation Systems  
2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

M-I, LLC  
c/o Capital Corporate Services,  
Inc.  
150 South Perry Street  
Montgomery, AL 36104

Anadarko E&P Co., LP  
c/o CT Corporation Systems  
2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

R. Bruce Barze, Jr.  
Amy Davis Adams  
counsel for The Estate of Gary  
L. Marcum, Sr. and Marcum  
Development, L.L.C.  
Balch & Bingham LLP  
1901 Sixth Avenue North,  
Suite 1500  
Birmingham, Alabama 35203

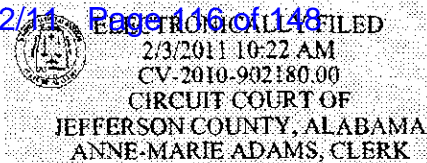
Transocean Holdings, LLC  
4 Greenway Plaza  
Suite 700  
Houston, TX 77046-0406

Cameron International  
Corporation  
f/k/a Cooper Cameron  
Corporation  
c/o CT Corporation Systems  
2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

DrilQuip, Inc.  
One Shell Plaza  
701 Poydras Street  
New Orleans, LA 70139

BP Exploration & Production,  
Inc.  
c/o CT Corporation Systems  
2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

*/s/ Clifton C. Mosteller*  
OF COUNSEL



**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM DIVISION**

SYNOVUS BANK,	)	
Plaintiff,	)	
	)	
V.	)	Case No.: CV-2010-902180.00
	)	
PLASH ISLAND RESORT LLC,	)	
ROTENBERRY KEITH,	)	
LOCKHART LEWIS M.,	)	
ROWE RICHARD D. ET AL,	)	
Defendants.	)	

**ORDER**

The plaintiff's motion to sever the third-party complaint, filed by defendant Plash Island Resort, LLC, is GRANTED. Because the third-party complaint, filed on January 17, 2011, is based on a completely different nucleus of facts, the claims and defendants named therein are misjoined in this action.

Pursuant to Rule 21 of the Alabama Rules of Civil Procedure, the Court orders that the claims of the third party complaint be severed so as to constitute a completely separate civil action. The Clerk of the Court is directed to assign a new Civil Action number to said action and confirm whether the requisite filing fees have been paid.

**DONE this 3<sup>rd</sup> day of February, 2011.**

/s ROBERT S. VANCE  
CIRCUIT JUDGE



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: JOSEPH JOE ALAN  
jjoseph@burr.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

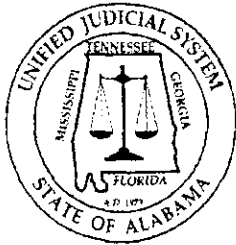
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: MOSTELLER CLIFTON CHARLES  
clifton.mosteller@burr.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: LUCADO MICHAEL SHANE  
slucado@lucadolaw.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BENTON LEE RIMES  
lbenton@bcattys.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov





## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: HAZELTON AMY MAY  
ahazelton@bcattys.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BARZE RONALD BRUCE JR  
bbarze@balch.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL

01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: ADAMS AMY DAVIS  
aadams@balch.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: DENNEY DAMON PATRICK  
420 20TH ST N STE 3400  
BIRMINGHAM, AL 35203

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: MOEX OFFSHORE 2007 (PRO SE)  
9 GREENWAY PLAZA  
HOUSTON, TX 77046

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: TRANSOCEAN OFFSHORE DEEPWATER DRILLING (PRO SE)  
C/O CT CORPORATION  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: TRANSOCEAN, LTD. (PRO SE)  
4 GREENWAY PLAZA  
HOUSTON, TX 77046

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

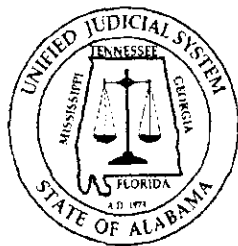
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BP, PLC (PRO SE)  
C/O CT CORP SYSTEMS  
1200 SOUTH PINE ISLAND RD  
PLANTATION, FL 33324

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov





## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: TRANSOCEAN DEEPWATER, INC (PRO SE)  
PARK TEN CENTRE  
1311BROADFIELD BLVDSTE400  
HOUSTON, TX 77084

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BP PRODUCTS NORTH AMERICA (PRO SE)  
C/O CSC LAWYERS INC SVC  
150 SOUTH PERRY STREET  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

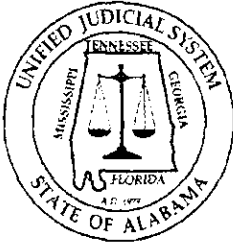
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: TRANSOCEAN HOLDINGS, LLC (PRO SE)  
4 GREENWAY PLAZA, STE700  
HOUSTON, TX 77046

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: TRITON ASSET LEASING GMBH (PRO SE)  
24 GREENWAY PLAZA  
HOUSTON, TX 77046

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BP AMERICA INC. (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: HALLIBURTON (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BP AMERICA PRODUCTION CO. (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST,STE605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: M-I, LLC (PRO SE)  
C/O CAPITAL CORP SVCS, INC  
150 SOUTH PERRY STREET  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov





## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: BP EXPLORATION & PRODUCTION INC (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: CAMERON INTERNATIONAL CORPORATION (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE 605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: ANADARKO PETROLEUM CORP. (PRO SE)  
C/O CT CORP SYSTEMS  
2 N JACKSON ST, STE605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

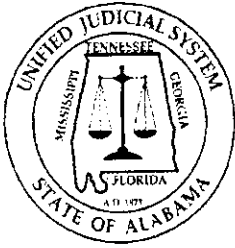
SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: DRILQUIP, INC. (PRO SE)  
ONE SHELL PLAZA  
701 POYDRAS STREET  
NEW ORLEANS, LA 70139

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2010-902180.00

Judge: COMPLEX LITIGATION DOCKET

To: ANADARKO E & P CO, LP (PRO SE)  
C/O CT CORPORATION SYSTEM  
2 N JACKSON ST,STE 605  
MONTGOMERY, AL 36104

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SYNOVUS BANK v. PLASH ISLAND RESORT LLC ET AL  
01-CV-2010-902180.00

The following matter was FILED on 2/3/2011 10:22:21 AM

Notice Date: 2/3/2011 10:22:21 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
BIRMINGHAM, AL 35203

205-325-5355  
anne-marie.adams@alacourt.gov



1200 S. Pine Island Road  
Plantation, FL 33324

954 473 5503 tel  
www.ctlegalsolutions.com

C

February 07, 2011

FILED IN OFFICE

FEB 14 2011

ANNE-MARIE ADAMS  
Clerk

Clifton C. Mosteller  
Burr & Forman LLP  
420 North 20th Street,  
3400 Wachovia Tower,  
Birmingham, AL 35203

Re: Synovus Bank, Pltf. vs. Plash Island Resort LLC, et al., Dfts. // To: BP, PLC

Case No. CV-2010-902180.00

Dear Sir/Madam:

We are herewith returning the Notice of Electronic Filing, Order which we received regarding the above captioned matter.

BP, PLC is not listed on our records or on the records of the State of FL.

T 004  
Very truly yours,

  
Lyndell McBride  
Process Specialist

Log# 517994448

FedEx Tracking# 796734298902

cc: Jefferson County Circuit Court, Alabama, Birmingham Division  
10th Judicial Circuit of Alabama,  
330 Jefferson County Courthouse,  
Birmingham, AL 35203

11-02-11 10:00 AM  
11-02-11 10:00 AM

11-02-11 10:00 AM



CT Corporation

2 North Jackson Street  
Suite 605  
Montgomery, AL 36104

800 592 9023 tel  
www.ctlegalsolutions.com

COPY

February 14, 2011

Robert S. Vance, Jr.  
330 Jefferson County Courthouse,  
Birmingham, AL 35203

Re: Synovus Bank, Pltf. vs. Plash Island Resort LLC, et al., Dfts. // To: Halliburton

Case No. CV-2010-902180.00

Dear Sir/Madam:

We are herewith returning the Notice, Order which we received regarding the above captioned matter.

Our records indicate that we represent more than one entity beginning with the name: Halliburton. In order that we may properly process the enclosed documents(s), we must be provided with the full name of the entity <sup>T 10</sup> for which it is intended.

Should you make this determination, please note the full name of the entity on the envelope, return the document(s) to us and we will be glad to forward it on.

Very truly yours,

*Laura Payne*

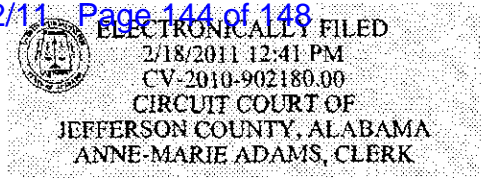
Laura Payne  
CT Rep

Log# 518014116

FedEx Tracking# 790733908520

cc: Jefferson County Circuit Court  
Jefferson Co. Courthouse Room 400,  
716 Richard Arrington, Jr. Blvd North,  
Birmingham, AL 35203

FILED IN OFFICE  
FEB 15 2011  
ANNE-MARIE ADAMS  
Clerk



**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

<b>SYNOVUS BANK</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No.: CV-2010-902180</b>
	)	
<b>PLASH ISLAND RESORT,</b>	)	
<b>LLC, et. al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**ANSWER TO COMPLAINT**

COMES NOW Defendant, Plash Island Resort, LLC, and for Answer to the Plaintiff's Complaint state as follows:

This Defendant denies the allegations contained in Plaintiff's Complaint and demands strict proof thereof.

**AFFIRMATIVE DEFENSES**

**First Affirmative Defense**

Defendant denies damages as alleged by Plaintiff in the Complaint.

**Second Affirmative Defense**

Plaintiff has failed to state a claim upon which relief may be granted.

**Third Affirmative Defense**

Plaintiff's claims are barred by applicable statutes of limitations and/or laches.



**Fourth Affirmative Defense**

Defendant pleads and otherwise reserves its rights to assert all defenses under Rule 12(b) of the Alabama Rules of Civil Procedure, including lack of jurisdiction, both as to subject matter and over the person, improper venue, insufficiency of service of process, and failure to join indispensable parties.

**Fifth Affirmative Defense**

Defendant pleads the lack of consideration.

**Sixth Affirmative Defense**

Plaintiff's claims are barred by the doctrines of waiver and estoppel.

**Seventh Affirmative Defense**

Plaintiff failed to mitigate its damages.

**Eighth Affirmative Defense**

Plaintiff failed to comply with conditions precedent prior to seeking payment or damages from this Defendant.

**Ninth Affirmative Defense**

Plaintiff's conduct in this matter has obstructed and hindered this Defendant's performance.

**Tenth Affirmative Defense**

Plaintiff's conduct in this matter caused the damages it now seeks to recover from this Defendant.

**Eleventh Affirmative Defense**

Plaintiff failed to cooperate and instead acted inequitably in attempting to seek recovery of any funds at issue

**Twelfth Affirmative Defense**

Plaintiff's claims are barred by the doctrine of unclean hands.

**Thirteenth Affirmative Defense**

Plaintiff's claims are barred by the doctrines of accord and satisfaction, and by release.

**Fourteenth Affirmative Defense**

This Defendant pleads intervening and superseding cause.

**Fifteenth Affirmative Defense**

This Defendant preserves any rights of indemnification it may have.

**Sixteenth Affirmative Defense**

Defendants adopt and incorporate any defenses not herein made which are asserted by the other defendants in this action.

**Seventeenth Affirmative Defense**

Defendant reserves the right to assert any additional defenses made available through the discovery process and to amend and assert claims of its own against this Plaintiff, other defendants in this action, or non-parties.

Defendant demands a trial by struck jury.

/s/ M. Shane Lucado  
M. Shane Lucado (LUC015)

Respectfully submitted,

/s/ M. Shane Lucado  
M. Shane Lucado (LUC015)

Attorney for Defendant, Plash  
Island Resort, LLC

OF COUNSEL:

LUCADO LAW FIRM, LLC  
1 Perimeter Park South  
Suite 125 S  
Birmingham, AL 35243  
205-278-0025  
205-278-0030 (fax)  
[slucado@lucadolaw.com](mailto:slucado@lucadolaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing Answer has been served by efile electronic transmission on the following counsel of record on this the 18<sup>th</sup> day of February, 2011.

Joe A. Joseph, Esq.  
Damon P. Denny, Esq.  
Clifton C. Mosteller, Esq.  
BURR & FORMAN, LLP  
420 North 20<sup>th</sup> Street  
Suite 3400  
Birmingham, AL 35203  
Attorneys for Plaintiff

Brian R. Walding, Esq.  
Donna K. Byrd, Esq.  
WALDING, INC.  
505 North 20<sup>th</sup> Street  
Suite 620  
Birmingham, AL 35203  
Attorneys for Plaintiff

R. Bruce Barze, Jr., Esq.  
Amy D. Adams, Esq.  
BALCH & BINGHAM, LLP  
1901 Sixth Avenue North  
Suite 1500  
Birmingham, AL 35203  
Attorneys for Donna S. Marcum

Lee R. Benton, Esq.  
Amy M. Hazelton, Esq.  
BENTON & CENTENO, LLP  
2019 Third Avenue North  
Birmingham, AL 35203

/s/ M. Shane Lucado  
Of counsel